

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

**Obj. Deadline: June 5, 2023 at 4:00 p.m. ET**

**SECOND MONTHLY FEE STATEMENT OF ERNST & YOUNG LLP AS  
TAX SERVICES PROVIDER TO THE DEBTORS AND DEBTORS-IN-POSSESSION  
FOR COMPENSATION FOR PROFESSIONAL SERVICES RENDERED AND  
REIMBURSEMENT OF EXPENSES INCURRED FOR THE PERIOD  
FROM JANUARY 1, 2023 THROUGH AND INCLUDING JANUARY 31, 2023**

<b>Name of Applicant</b>	<b>Ernst &amp; Young LLP</b>
Authorized to Provide Professional Services to:	the Debtors and Debtors-in-Possession
Date of Retention:	January 17, 2023 <i>nunc pro tunc</i> to November 28, 2022
Period for which compensation and reimbursement is sought:	January 1, 2023 through January 31, 2023
Amount of Compensation sought as actual, reasonable and necessary:	\$1,130,705.00
80% of Compensation sought as actual, reasonable and necessary:	\$904,564.00
Amount of Expense Reimbursement sought as actual, reasonable, and necessary:	\$32,893.58

This is a(n) ☒ monthly \_\_\_\_ interim \_\_\_\_ final application. No prior application has been filed with respect to this Fee Period.

<sup>1</sup> The last four digits of FTX Trading Ltd.'s and Alameda Research LLC's tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors' claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

**SUMMARY OF BILLING BY PROFESSIONAL**  
**JANUARY 1, 2023 THROUGH AND INCLUDING JANUARY 31, 2023**

<b>Name</b>	<b>Type</b>	<b>Rank</b>	<b>Hours</b>	<b>Hourly Rate</b>	<b>Total Individual Fees</b>
Lowery,Kristie L	Billable	National Partner/Principal	51.60	\$990.00	\$51,084.00
Lowery,Kristie L	Travel <sup>1</sup>	National Partner/Principal	7.00	\$495.00	\$3,465.00
McComber,Donna	Billable	National Partner/Principal	17.00	\$990.00	\$16,830.00
Simpson,Kirsten	Billable	National Partner/Principal	6.40	\$990.00	\$6,336.00
Stevens,Matthew Aaron	Billable	National Partner/Principal	0.80	\$990.00	\$792.00
Yen,Jason	Billable	National Partner/Principal	1.00	\$990.00	\$990.00
Bailey,Doug	Billable	Partner/Principal	98.00	\$825.00	\$80,850.00
Farrar,Anne	Billable	Partner/Principal	19.10	\$825.00	\$15,757.50
Ferris,Tara	Billable	Partner/Principal	23.40	\$825.00	\$19,305.00
Gengler,Charlie	Billable	Partner/Principal	4.80	\$825.00	\$3,960.00
Hutchison,Keiran	Billable	Partner/Principal	4.30	\$850.00	\$3,655.00
Joseph,Carl A	Billable	Partner/Principal	0.50	\$825.00	\$412.50
Kelly,Ryan J	Billable	Partner/Principal	0.40	\$825.00	\$330.00
Knoeller,Thomas J.	Billable	Partner/Principal	33.50	\$825.00	\$27,637.50
Lovelace,Lauren	Billable	Partner/Principal	37.00	\$825.00	\$30,525.00
O'Brien,Mike	Billable	Partner/Principal	3.90	\$825.00	\$3,217.50
Richards,Briana A.	Billable	Partner/Principal	8.00	\$1,150.00	\$9,200.00
Rumford,Neil	Billable	Partner/Principal	12.30	\$990.00	\$12,177.00
Shea JR,Thomas M	Billable	Partner/Principal	130.40	\$825.00	\$107,580.00
Stackhouse,Kent	Billable	Partner/Principal	0.40	\$825.00	\$330.00
Toi,Sarah Massey	Billable	Partner/Principal	1.50	\$825.00	\$1,237.50
Bost,Anne	Billable	Managing Director	14.50	\$775.00	\$11,237.50
Carlson,Tim	Billable	Managing Director	1.80	\$775.00	\$1,395.00
Cotopoulos,Alex	Billable	Managing Director	8.70	\$775.00	\$6,742.50
Daly,Cathy	Billable	Managing Director	1.00	\$775.00	\$775.00
DeVincenzo,Jennie	Billable	Managing Director	22.00	\$775.00	\$17,050.00
Dubroff,Andy	Billable	Managing Director	1.70	\$775.00	\$1,317.50
Duvoisin,Eric	Billable	Managing Director	0.50	\$775.00	\$387.50
Flagg,Nancy A.	Billable	Managing Director	15.00	\$775.00	\$11,625.00
Jackel,Jonathan	Billable	Managing Director	0.50	\$775.00	\$387.50
Koch,Markus	Billable	Managing Director	2.60	\$775.00	\$2,015.00
Ritz,Amy Felice	Billable	Managing Director	3.60	\$775.00	\$2,790.00
Scheele,Ashley	Billable	Managing Director	8.60	\$775.00	\$6,665.00
Soderman,Kathy	Billable	Managing Director	4.80	\$775.00	\$3,720.00
Yencho,Jeremiah	Billable	Managing Director	4.80	\$775.00	\$3,720.00
Ash,Polly Westerberg	Billable	Senior Manager	66.20	\$650.00	\$43,030.00
Berman,Jake	Billable	Senior Manager	39.90	\$650.00	\$25,935.00
Bowden,Jamie	Billable	Senior Manager	0.40	\$650.00	\$260.00
Bugden,Nick R	Billable	Senior Manager	5.40	\$900.00	\$4,860.00

<b>Name</b>	<b>Type</b>	<b>Rank</b>	<b>Hours</b>	<b>Hourly Rate</b>	<b>Total Individual Fees</b>
Coffey,Mandy V.	Billable	Senior Manager	5.00	\$650.00	\$3,250.00
Ellenson,Cory	Billable	Senior Manager	5.00	\$650.00	\$3,250.00
Gala,Chintan	Billable	Senior Manager	0.50	\$650.00	\$325.00
Gatt,Katie	Billable	Senior Manager	2.20	\$650.00	\$1,430.00
Hamano,Taisuke	Billable	Senior Manager	0.60	\$650.00	\$390.00
Jayanthi,Lakshmi	Billable	Senior Manager	49.70	\$650.00	\$32,305.00
Jimenez,Joseph Robert	Billable	Senior Manager	9.90	\$650.00	\$6,435.00
Madhok,Kishan	Billable	Senior Manager	10.30	\$650.00	\$6,695.00
Musano,Matthew Albert	Billable	Senior Manager	24.60	\$650.00	\$15,990.00
Nichol,T.J.	Billable	Senior Manager	104.50	\$650.00	\$67,925.00
Nicholas,Russell Kenneth	Billable	Senior Manager	1.00	\$650.00	\$650.00
Owsley,John Christopher	Billable	Senior Manager	9.00	\$650.00	\$5,850.00
Raulli,Lindsay Elizabeth	Billable	Senior Manager	13.80	\$650.00	\$8,970.00
Rule,Martin Daniel	Billable	Senior Manager	1.80	\$650.00	\$1,170.00
Schwarzwlder,Christian	Billable	Senior Manager	1.60	\$650.00	\$1,040.00
Song,Young Ju	Billable	Senior Manager	4.00	\$650.00	\$2,600.00
Tong,Chia-Hui	Billable	Senior Manager	13.20	\$650.00	\$8,580.00
Vise,Grace	Billable	Senior Manager	1.00	\$650.00	\$650.00
Yang,Annie	Billable	Senior Manager	0.10	\$650.00	\$65.00
Carreras,Stephen	Billable	Manager	1.50	\$525.00	\$787.50
Davis,Kathleen F.	Billable	Manager	8.10	\$525.00	\$4,252.50
Dickerson,Kelsey	Billable	Manager	7.40	\$525.00	\$3,885.00
Flannery,Jennifer	Billable	Manager	2.50	\$525.00	\$1,312.50
Gil Diez De Leon,Marta	Billable	Manager	2.30	\$525.00	\$1,207.50
Hammon,David Lane	Billable	Manager	142.70	\$525.00	\$74,917.50
Hammon,David Lane	Travel <sup>1</sup>	Manager	6.00	\$262.50	\$1,575.00
Katsnelson,David	Billable	Manager	12.90	\$525.00	\$6,772.50
Meagher,Gentine	Billable	Manager	1.00	\$525.00	\$525.00
Mistler,Brian M	Billable	Manager	6.50	\$525.00	\$3,412.50
Richardson,Audrey Sarah	Billable	Manager	36.50	\$525.00	\$19,162.50
Santoro,David	Billable	Manager	49.90	\$525.00	\$26,197.50
Staromiejska,Kinga	Billable	Manager	45.30	\$525.00	\$23,782.50
Wrenn,Kaitlin Doyle	Billable	Manager	84.60	\$525.00	\$44,415.00
Wrenn,Kaitlin Doyle	Travel <sup>1</sup>	Manager	4.00	\$262.50	\$1,050.00
Zheng,Eva	Billable	Manager	5.00	\$525.00	\$2,625.00
Ancona,Christopher	Billable	Senior	64.60	\$395.00	\$25,517.00
Canale,Steven P.	Billable	Senior	1.60	\$395.00	\$632.00
Carver,Cody R.	Billable	Senior	19.00	\$395.00	\$7,505.00
Chebar,Johana	Billable	Senior	1.50	\$395.00	\$592.50
Chyan,Megan	Billable	Senior	0.20	\$395.00	\$79.00
Di Stefano,Giulia	Billable	Senior	19.40	\$395.00	\$7,663.00
Guinet,Margot Madeleine	Billable	Senior	0.30	\$395.00	\$118.50

Name	Type	Rank	Hours	Hourly Rate	Total Individual Fees
Guzman Chamorro, Itzel	Billable	Senior	1.40	\$395.00	\$553.00
Hall, Emily Melissa	Billable	Senior	33.90	\$395.00	\$13,390.50
Hamilton, Mary Catherine	Billable	Senior	25.40	\$395.00	\$10,033.00
Katelas, Andreas	Billable	Senior	1.50	\$395.00	\$592.50
Loo, Lydia	Billable	Senior	23.70	\$395.00	\$9,361.50
MacLean, Corrie	Billable	Senior	39.90	\$395.00	\$15,760.50
Marlow, Joe	Billable	Senior	1.80	\$395.00	\$711.00
Rodriguez, Lenny	Billable	Senior	5.60	\$395.00	\$2,212.00
Short, Victoria	Billable	Senior	0.20	\$395.00	\$79.00
Steigler, Ella	Billable	Senior	5.80	\$395.00	\$2,291.00
Sun, Yuchen	Billable	Senior	3.00	\$395.00	\$1,185.00
Alfaro, Adriana	Billable	Staff	26.20	\$225.00	\$5,895.00
Cortes, Jackie	Billable	Staff	4.50	\$225.00	\$1,012.50
Garcia, Casey	Billable	Staff	9.90	\$225.00	\$2,227.50
Hall, Olivia	Billable	Staff	8.50	\$225.00	\$1,912.50
Huang, Vanesa	Billable	Staff	1.00	\$225.00	\$225.00
Johnson, Derrick Joseph	Billable	Staff	5.70	\$225.00	\$1,282.50
Karan, Anna Suncheuri	Billable	Staff	20.30	\$225.00	\$4,567.50
Pulliam, Michelle	Billable	Staff	6.70	\$225.00	\$1,507.50
Stillman, Will	Billable	Staff	1.80	\$225.00	\$405.00
Velpuri, Cury	Billable	Staff	0.60	\$225.00	\$135.00
Wong, Maddie	Billable	Staff	5.00	\$225.00	\$1,125.00
Scott, James	Billable	Client Serving Contractor JS	139.20	\$600.00	\$83,520.00
Scott, James	Travel <sup>1</sup>	Client Serving Contractor JS	11.20	\$300.00	\$3,360.00
Bieganski, Walter	Billable	Client Serving Contractor WB	11.10	\$200.00	\$2,220.00
<b>Totals</b>			<b>1,837.80</b>		<b>\$1,130,705.00</b>

<sup>1</sup> Travel fees are billed out at 50% bill rate

**Blended Hourly Rate: \$615.25**

**STATEMENT OF FEES BY PROJECT CATEGORY**  
**JANUARY 1, 2023 THROUGH AND INCLUDING JANUARY 31, 2023**

<b>Project Category</b>	<b>Project Category Description</b>	<b>Hours</b>	<b>Fees</b>
Chapter 11 Process and Case Management	This category includes coordinating with the Debtors and their professionals to effectively and efficiently plan, coordinate and manage the chapter 11 post-petition process, including preparation of motions, support in filing of objections and other case related procedures.	1.80	\$711.00
Fee/Employment Applications	This category relates to the preparation of EY's employment application and planning and coordinating the professionals' time protocols, preparation of monthly fee statements, preparation of interim fee applications, invoices, and responding to inquiries	35.20	\$16,560.50
Information Reporting	Reporting of income paid to certain US-based investors, vendors, and independent contractors	199.70	\$117,089.00
IRS Audit Matters	Responding to the inquiries of the IRS related to current/prior tax years	2.70	\$1,755.00
Liquidation Activities	This category relates to the analysis of the entities being considered for liquidation across the global FTX organization, including coordination efforts between US and local jurisdictions. This also relates to the preparation of local liquidation plan options as well as statutory requirements and procedures required.	20.20	\$19,818.00
Non US Tax	Taxation of all non-US based or related activities and taxpayers	278.70	\$154,393.50
Non-Working Travel (billed at 50% of rates)	This category includes all travel time not otherwise chargeable to the Debtors. This time is charged at a 50% rate.	28.20	\$9,450.00
Payroll Tax	Taxation of Global and US-based payroll and employment tax requirements	257.50	\$146,768.50
Project Management Office Transition	Service Management: oversee consistent status reporting across workstreams to ensure activities are tracked and risks, assumptions, issues, and dependencies are tracked and remediated.	222.70	\$145,025.50
Tax Advisory	The projects covered by on-call tax advisory services include assistance with tax issues by answering one-off questions, drafting memos describing how specific tax rules work, assisting with general transactional issues, and assisting Client in connection with	148.50	\$113,151.00

Project Category	Project Category Description	Hours	Fees
	International Tax Services dealings with tax authorities (other than representing Client in an examination or an appeal before the IRS or other taxing authority).		
Transfer Pricing	Determine arm's length pricing in related-party transactions	62.20	\$38,492.00
US Income Tax	Taxation of all US-based or related activities and taxpayers	279.70	\$193,628.00
US International Tax	Taxation of all non-US based or related activities as it impacts on US based taxpayers	104.20	\$63,107.50
US State and Local Tax	Taxation of all US-based or related activities and taxpayers as assessed by each state and local jurisdiction	182.70	\$102,203.50
Value Added Tax	Taxation of non-US based indirect based or related activities and taxpayers	13.80	\$8,552.00
<b>Total</b>		<b>1,837.80</b>	<b>\$1,130,705.00</b>

**SUMMARY OF ACTUAL AND NECESSARY EXPENSES**

Expense Category	Expense Amount
Airfare	\$2,485.96
Ground Transportation	\$801.31
Lodging	\$2,382.41
Meals	\$360.90
Miscellaneous	\$8.00
Fees of EY LLP's Outside Legal Counsel – December 2022	\$12,405.00
Fees of EY LLP's Outside Legal Counsel – January 2023	\$14,450.00
<b>Total</b>	<b>\$32,893.58</b>

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

**SECOND MONTHLY FEE STATEMENT OF ERNST & YOUNG LLP AS  
TAX SERVICES PROVIDER TO THE DEBTORS AND DEBTORS-IN-POSSESSION  
FOR COMPENSATION FOR PROFESSIONAL SERVICES RENDERED AND  
REIMBURSEMENT OF EXPENSES INCURRED FOR THE PERIOD  
FROM JANUARY 1, 2023 THROUGH AND JANUARY 31, 2023**

Ernst & Young LLP (“EY LLP”), Tax Services Provider to FTX Trading Ltd. and its affiliated debtors and debtors-in-possession in the above-captioned cases (collectively, the “Debtors”), hereby submits this second monthly fee statement (this “Monthly Fee Statement”) for compensation for professional services rendered and expenses incurred for the period from January 1, 2023 through and including January 31, 2023 (the “Fee Period”). In support of the Monthly Fee Statement, EY LLP respectfully states as follows:

**Background**

1. On November 11 and November 14, 2022,<sup>2</sup> the Debtors filed with the United States Bankruptcy Court for the District of Delaware (the “Court”) voluntary petitions for relief under title 11 of the United States Code, 11 U.S.C. §§ 101 *et seq.* (as amended or modified, the “Bankruptcy Code”). The Debtors continue to operate their businesses and manage their

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<sup>1</sup> The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

<sup>2</sup> November 11, 2022 is the petition date for all Debtors, except for Debtor West Realm Shires Inc.



properties as debtors-in-possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code. Joint administration of the Debtors' cases (the "Chapter 11 Cases") was authorized by the Court by entry of an order on November 22, 2022 [D.I. 128]. On December 15, 2022, the Office of the United States Trustee for the District of Delaware (the "U.S. Trustee") appointed an Official Committee of Unsecured Creditors (the "Committee") pursuant to section 1102 of the Bankruptcy Code [D.I. 231].

2. On January 17, 2023, the Court entered the Order Authorizing the Retention and Employment of EY LLP as Tax Services Provider *Nunc Pro Trunc* to November 28, 2022 [D.I. 505] authorizing the retention and employment of EY LLP as the Debtors' Tax Services Provider, *nunc pro tunc* to November 28, 2022.

3. On January 9, 2023, the Court entered the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals* [D.I. 435] (the "Interim Compensation Order").

### **Relief Requested**

4. By this Monthly Fee Statement and in accordance with the Interim Compensation Order, EY LLP makes this application for (i) allowance of compensation as an administrative expense of the Debtors' estates in the amount of \$1,130,705.00 for reasonable and necessary professional services rendered, (ii) payment of compensation in the amount of 80% thereof (in the amount of \$904,564) and (iii) payment of \$32,893.58 for actual and necessary expenses incurred.

#### **a. Compensation Requested**

5. The services performed by EY LLP during the Fee Period included tax services. Attached hereto as Exhibit A is a detailed itemization, by project category, of all services performed by EY LLP with respect to the Chapter 11 Cases during the Fee Period. This

detailed itemization complies with Local Rule 2016-2 in that each time entry contains a separate time allotment, a description of the type of activity and the subject matter of the activity, all time is billed in increments of one-tenth (1/10) of an hour, time entries are presented chronologically in categories, and all meetings or hearings are individually identified.

6. The timekeepers who rendered services related to each category are identified in Exhibit A, along with the number of hours for each individual and the total compensation sought by each category. All services for which EY LLP requests compensation were performed for, or on behalf of, the Debtors.

**b. Expense Reimbursement**

7. EY LLP incurred out-of-pocket expenses during the Fee Period in the amount of \$32,893.58. Attached hereto as Exhibit B is a description of the expenses actually incurred by EY LLP in the performance of services rendered as Tax Services Provider to the Debtors. The expenses are broken down into categories of charges, which may include, among other things, the following charges: photocopying, printing, outgoing facsimiles, document retrieval, postage, third-party conference calls, messenger service, transcripts, computerized legal research, filing fees, working meals, secretarial overtime, and other expenses.

8. In accordance with section 330 of the Bankruptcy Code, EY LLP seeks reimbursement only for the actual cost of such expenses to EY LLP. EY LLP submits that all such expenses incurred were customary, necessary and related to the Chapter 11 Cases and, by this Monthly Fee Statement, requests reimbursement of the same.

**Valuation of Services**

9. Professionals of EY LLP have expended a total of 1,837.80 hours in connection with this matter during the Fee Period.

10. The amount of time spent by each of the professionals providing services to the Debtors for the Fee Period is set forth in Exhibit A. The rates are EY LLP's normal hourly rates of compensation for work of this character. The reasonable value of the services rendered by EY LLP for the Fee Period as Tax Services Provider for the Debtors in the Chapter 11 Cases is \$1,130,705.00.

11. EY LLP believes that the time entries included in Exhibit A attached hereto and the expense breakdown set forth in Exhibit B attached hereto are in compliance with the requirements of Local Rule 2016-2.

12. In accordance with the factors enumerated in section 330 of the Bankruptcy Code, the amount requested is fair and reasonable given the complexities of these Chapter 11 Cases, the time expended, the nature and extent of the services rendered, the value of such services, and the costs of comparable services other than in a case under this title.

**Certificate of Compliance and Waiver**

13. The undersigned representative of EY LLP certifies that he has reviewed the requirements of Local Rules 2016-2 and that the Monthly Fee Statement substantially complies with such rule. To the extent that the Monthly Fee Statement does not comply in all respects with the requirements of Local Rule 2016-2, EY LLP believes that such deviations are not material and respectfully requests that any such requirements be waived.

**Notice and No Prior Request**

14. Notice of this Monthly Fee Statement has been given to the following parties or, in lieu of, to their counsel, if known: (a) the U.S. Trustee; (b) the Official Committee of Unsecured Creditors and (d) all parties required to be given notice in the Interim Compensation Order. EY LLP submits that no other or further notice is necessary.

15. No prior request for the relief sought in this Monthly Fee Statement has been made to this or any other Court.

WHEREFORE, EY LLP respectfully requests that the Bankruptcy Court (i) approve the Monthly Fee Statement and (ii) grant such further relief as is just and proper.

/s/ Thomas M. Shea  
Thomas M. Shea  
Partner/Principal  
Ernst & Young LLP